

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT LEXINGTON

Garey E. Lindsay, Regional Director of
the Ninth Region of the National Labor
Relations Board, for and on behalf of
the National Labor Relations Board

Petitioner,

vs.

Leggett & Platt, Inc.,

Respondent.

Civil Action No. 5:17-198-KKC

Judge Karen K. Caldwell

DECLARATION OF TINA FREEMAN

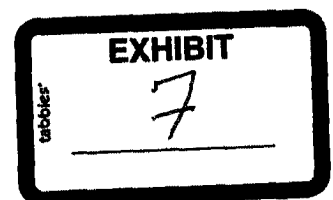
I, Tina Freeman, hereby depose and stated as follows:

1. I am making this declaration voluntarily. I understand that my position at Leggett & Platt, Inc. ("Company") is in no way affected by me making this declaration. I have not been promised anything of benefit by Company for making this declaration, and I have not been threatened by Company in any way in connection with this declaration. I was assured by Company that I was free to give this declaration or not, without promise of benefit, threat of reprisal or any other impact on my employment. I understand that this declaration concerns the circumstances surrounding the signing of a pro-union petition, and may be introduced into evidence in a case between the Company and the NLRB.

2. I work at the Company's Winchester plant (plant #002), and have been represented by the International Association of Machinists Union, Local 619 ("Union").

3. On December 7, 2016, I signed a petition stating, "The undersigned employees of Leggett and Platt #002 do not want to be represented by IAM 619 hereafter referred to as 'union.'" A true and correct copy of the petition I signed on December 7, 2016 is attached as Exhibit A.

4. On January 18, 2017, I attended a meeting called by the Union at the Union hall. At that meeting, I was told that if I wanted information regarding the insurance, I should sign a piece of paper. Others were in line with me and heard the same statement. The paper I was told to sign had 20 lines on it for employee signatures. I do not believe that this paper contained a statement at the top stating,



"We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc." If this paper had contained such a statement, I would not have signed it because I did not support the Union on January 18, 2017, and I have not supported the Union at any time since I signed Exhibit A.

5. There was another table at the meeting as well. If called to testify in this matter, I would state that I heard union supporters at the other table telling people in line there that they needed to sign a document in order to get strike pay.

6. Attached as Exhibit B is a piece of paper that appears to bear my signature at line 5. I did not sign this document. I know this because I would not have signed a document stating that I supported the Union.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in the county of Clark, State of Kentucky, on this May day of 23 2017.


Tina Freeman


JOHNNIE'S POULTY STATEMENT

1. My name is John Harper. I am an attorney representing Leggett & Platt.
2. I would like to ask you some questions relating to an unfair labor practice charge and associated legal proceedings alleging that the Company is unlawfully refusing to bargain with the Union.
3. You are not obligated to talk to me. If you talk to me and answer my questions, it will be entirely voluntary on your part. Your job at Leggett & Platt will in no way be affected by whether you talk to me or do not talk to me. Furthermore, regardless of your decision, there will be no prejudice or benefit to you. You will not be penalized or discriminated against in any way by Leggett & Platt, and you will not receive any benefit from Leggett & Platt, by reason of any answers you may give me. You also may decide to answer only part of my questions, and you can terminate our discussion at any time you wish. Again, there will be no penalties, retaliation or benefit of any kind based on your decision.
4. If you answer my questions, you should know that I want to know only the exact truth from your answers. Please do not give me an answer you think I would like to hear. Instead tell me the exact truth whether or not you think I would like it.
5. I do not want to know whether you are for the Union or against the Union or whether or not you are supportive of any effort to decertify the Union. I would merely like to know the facts about the events that I have mentioned.

ACKNOWLEDGMENT BY EMPLOYEE

The undersigned hereby declares that I have read the above, and that I am giving a true and correct statement in this matter entirely of my own free choice without any type of force or coercion on the part of Leggett & Platt or its lawyer.

Dated: 5-22, 2017



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